

LSK&D #:643-0087/4849-7113-9414

Robyn J. Leader, Esq.

Attorney ID # 020932000

LESTER SCHWAB KATZ & DWYER, LLP

500 Frank W. Burr Blvd., 5th Floor, Suite 31

Teaneck, NJ 07666

973 912-9501

Attorneys for Defendants

WILLIAM A. FOREMAN and WURTH BROTHERS, INC.

-----X

MONIQUE LESTER,

Plaintiff,

– against –

NOTICE OF REMOVAL

WILLIAM A. FOREMAN and WURTH

BROTHERS, INC.,

Defendants.

-----X

The notice of removal of defendants William A. Foreman and Wurth Brothers, Inc., incorrectly sued herein as Wurth Brothers Inc., states:

1. On or about November 6, 2017, plaintiff Monique Lester (Lester) commenced a civil action against defendants William A. Foreman (Foreman) and Wurth Brothers, Inc. (Wurth Brothers) in New Jersey Superior Court, Law Division, Bergen County, under docket number BER-L-7534-17, by filing a complaint, Exhibit A, captioned *Monique Lester v. William A. Foreman, Wurth Brothers Inc.*

2. Defendants filed their answer to the complaint, Exhibit B, on or about November 17, 2017.

3. Lester was at the time this action was commenced and still is a citizen of New Jersey, residing at 278 Main Street Little Ferry, New Jersey.

4. Wurth Brothers was at the time this action was commenced and still is a citizen of the Illinois, as it is an Illinois business corporation having its principal place of business at 1648 2000th Avenue, Beason, Illinois 62512.

5. Foreman was at the time this action was commenced and still is a citizen of Illinois residing at 210 State Route 26, Lacon, Illinois 61340.

6. The complaint demands one million dollars in damages.

7. This action is one over which this court has original jurisdiction in that the citizenship of the parties is completely diverse under 28 U.S.C. section 1332(a) and the amount in controversy exceeds seventy-five thousand dollars exclusive of interest and costs.

8. This action is removable in that the no defendant is a citizen of New Jersey and this notice is filed within thirty days of the commencement of the action.

9. This action is removed to this Court.

Dated: Teaneck, New Jersey
November 22, 2017

LESTER SCHWAB KATZ & DWYER, LLP
Attorneys for Defendants

By: Robyn J. Leader
Robyn J. Leader

LSK&D #:643-0087/4849-7113-9414

Robyn J. Leader, Esq.

Attorney ID # 020932000

LESTER SCHWAB KATZ & DWYER, LLP

500 Frank W. Burr Blvd., 5th Floor, Suite 31

Teaneck, NJ 07666

973 912-9501

Attorneys for Defendants

WILLIAM A. FOREMAN and WURTH BROTHERS, INC.

-----X
MONIQUE LESTER,

Plaintiff,

– against –

WILLIAM A. FOREMAN and WURTH
BROTHERS, INC.,

Defendant(s).
-----X

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY**

Docket No. BER-L-7534-17

**NOTICE OF REMOVAL
TO FEDERAL
DISTRICT COURT**

Please take notice that this action was removed to the United States District Court for the
District of New Jersey pursuant to the attached notice of removal.

Dated: Teaneck, New Jersey
November 22, 2017

LESTER SCHWAB KATZ & DWYER, LLP
Attorneys for Defendants

By: 

Robyn J. Leader

TO: SEIGEL LAW LLC
505 Goffle Road
Ridgewood, New Jersey 07450
(201) 444-4000
Attorneys for Plaintiff